

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-259  
(DCG-JES-JVB)  
(consolidated cases)

**TEXAS STATE CONFERENCE OF THE NAACP'S  
DESIGNATION OF TESTIFYING EXPERTS**

Pursuant to this Court's Order dated December 17, 2021 (Dkt. 96) and the Joint Stipulation Modifying Expert Deadlines dated May 11, 2022 (Dkt. 268), the Texas State Conference of the NAACP hereby designates the following testifying experts.

1. **Dr. Moon Duchin.** Dr. Duchin is a Professor of Mathematics and a Senior Fellow in the Jonathan M. Tisch College of Civic Life at Tufts University. Dr. Duchin is the principal investigator of an interdisciplinary research lab focused on geometric and computation aspects of redistricting. Dr. Duchin's areas of research and teaching include the structure of census data, the history of the Census, the design and implementation of randomized algorithms for generating districting plans, and the analysis of redistricting more broadly. Dr. Duchin is expected to testify as to each of the three *Gingles* preconditions, whether and to what extent there exists evidence of racial gerrymandering, and whether and to what extent political participation among Black, Hispanic, and Asians is depressed relative to Anglo political participation.
2. **Dr. Peyton McCrary.** Dr. McCrary is a historian and former member of the Voting Section of the Civil Rights Division of the United States Department of Justice. As a historian, Dr. McCrary has published numerous studies in scholarly journals, chapters in refereed books, and law reviews dealing with the history of discriminatory election laws in the South, evidence concerning discriminatory intent or racially polarized voting presented in the context of voting rights litigation, and the impact of the Voting Rights Act in the South. While at DOJ, Dr. McCrary worked closely on issues relating to election law, including research and analysis of racially polarized voting. Dr. McCrary is expected to testify on the Senate Factors and discriminatory intent.

Copies of Dr. Duchin's and Dr. McCrary's reports and any other materials required by Federal Rule of Civil Procedure 26 are being served on the parties.

Dated: May 20, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed using the Court's ECF filing system on May 20, 2022, which will send notification of such filing to all counsel of record.

/s/ Lindsey B. Cohan  
LINDSEY COHAN

*Counsel for Plaintiff Texas NAACP*